

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IRA A. TURRET SEP-IRA DATED
01/24/02, Individually and On Behalf
Of All Others Similarly Situated,

Plaintiff,

v.

VASO ACTIVE PHARMACEUTICALS, INC.,
JOHN J. MASIZ, and JOSEPH FRATTAROLI
Defendants.

CIVIL ACTION NO.
04-10980 (RCL)

CHARLES ROBINSON,
Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

VASO ACTIVE PHARMACEUTICALS, INC.,
JOHN J. MASIZ and JOSEPH FRATTAROLI,
Defendants.

CIVIL ACTION NO.
04-11221 (RCL)

**JOINT MOTION AND [PROPOSED] ORDER
TO EXTEND TIME TO RESPOND TO THE COMPLAINT**

The parties hereto, by and through their counsel, hereby agree to extend the time within which defendants Vaso Active Pharmaceuticals, Inc, John J. Masiz and Joseph Frattaroli (collectively the “Defendants”) must answer, move or otherwise respond to the complaints in these actions. Plaintiffs’ counsel has represented that plaintiffs will file an amended complaint in these actions. Thus, the parties respectfully request that the pleading and briefing schedule ordered on May 21, 2004 in the related

matter entitled In re Vaso Active Pharmaceuticals, Inc. Securities Litigation, 04-10708-RCL, apply to these cases.

Dated: June 8, 2004

IRA A. TURRET SEP-IRA DATED 01/24/02,
and CHARLES ROBINSON, Individually and
On Behalf of All Others Similarly Situated,

By their attorneys,

/s/ N. Nancy Ghabai

Jeffrey C. Block, BBO #600747
Michael T. Matraia, BBO #633049
N. Nancy Ghabai, BBO #645050
BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO
One Liberty Square, 8th Floor
Boston, Massachusetts 02109

***Co-counsel for Plaintiff Ira A. Turret SEP-
IRA Dated 01/24/02 and Charles Robinson:***

Richard A. Speirs
Stephen L. Brodsky
Shaye J. Fuchs
ZWERLING, SCHACHTER
& ZWERLING, LLP
845 Third Avenue
New York, NY 10022
(212) 223-3900

Co-counsel for Plaintiff Charles Robinson:

Richard A. Lockridge
Karen H. Reibel
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue, South
Suite 2200
Minneapolis, MN 55401
(612) 339-6900

VASO ACTIVE PHARMACEUTICALS, INC.,
JOHN J. MASIZ, and JOSEPH FRATTAROLI,

By their attorneys,

/s/ Colleen Dunham Henschke

Jeffrey B. Rudman (BBO #433380)
Michael G. Bongiorno (BBO #558748)
Colleen Dunham Henschke (BBO #645009)
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street,
Boston, Massachusetts 02109
(617) 526-6000

Richard S. Kraut
DILWORTH PAXSON LLP
1818 N Street, N.W., Suite 400
Washington, D.C. 20036
(202) 452-0900

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served on this 8th day of June, 2004 either electronically or by overnight mail on:

N. Nancy Ghabai, BBO #645050
BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO
One Liberty Square, 8th Floor
Boston, Massachusetts 02109

/s/ Colleen Dunham Henschke